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Before the  
FEDERAL COMMUNICATIONS COMMISSION  
Washington, D.C. 20554

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In the Matter of	)	
	)	
Implementation of the Pay Telephone	)	
Reclassification and Compensation	)	CC Docket No. 96-128
Provisions of the	)	
Telecommunications Act of 1996	)	
	)	
RBOC/GTE/SNET Payphone Coalition	)	NSD File No. L-99-34
Petition for Reconsideration	)	

**AT&T Reply on Petitions for Declaratory Ruling, Reconsideration and/or  
Clarification**

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October 22, 2001

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**AT&T Reply on Petitions for Declaratory Ruling, Reconsideration and/or  
Clarification**

Pursuant to the Commission's Public Notice, AT&T Corp. ("AT&T") hereby replies to the comments on the petitions for declaratory ruling, reconsideration and/or clarification submitted in response to the Commission's *Second Order on Reconsideration* ("Order").

**Introduction and Summary**

The *Order* was intended to bring clarity, completeness and auditability to the processes used to administer payphone compensation. Unfortunately, the Petitions and comments demonstrate that the new rules have not achieved those objectives – at least not yet. AT&T's Reply attempts to cut through some of the confusion, contentiousness and positioning in the comments and to describe a process that is fair to all parties.

As a threshold matter, however, it is essential to re-state some basic underlying facts relating to payphone compensation:

*First*, the *Order* (§ 1) finds that PSPs have had difficulty in obtaining compensation for coinless payphone calls that have a switch-based reseller (“SBR”) in the call path.

*Second*, in an attempt to resolve such difficulties, the *Order* (*id.*) modifies the Commission’s rules. Specifically, it provides that the first facilities based interexchange carrier (“FFB IXC” or “IXC”) to whom the originating LEC directly delivers calls that are routed to SBRs should assume the administrative duty to track and pay PSPs for such completed calls.<sup>1</sup> This change was made (§ 8) to remove the “uncertainty in the market” because of disagreements between FFB IXCs and SBRs over their obligations under the existing compensation mechanism.<sup>2</sup>

*Third*, the Commission (§§ 2, 11) made it clear that FFB IXCs should not face additional financial liability as a result of the modified rules. Thus, these are *administrative changes* intended to make it easier for PSPs to receive compensation and to have access to information reasonably necessary to verify the compensation payments they receive. As the Commission expressly stated (§ 15), the modifications were made “in the interest of *administrative efficiency* and lower costs” (emphasis added).

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<sup>1</sup> A number of commenters note that there was no intent on the Commission’s part to exclude LECs that handle coinless payphone calls to be exempt from similar requirements. *E.g.*, Bulletins Petition at 2-4; APCC at 11-12. AT&T agrees that, although this inference can be drawn from the *Order*, the Commission’s rules should be clarified to assure this result.

<sup>2</sup> Notably, there is an absence of complaint from the commenters that AT&T is involved in such disputes (*see* RBOC Coalition at 11).

*Fourth*, the *Order* (§ 20) recognized that pre-existing compensation processes would have to be modified to accomplish these results. In this regard, the parties generally agree that FFB IXCs do not have direct access to information that enables them to determine whether calls routed to SBRs' switches are completed.<sup>3</sup>

*Fifth*, and finally, the Commission (§ 18) modified its reporting requirements for FFB IXCs, obliging them to provide PSPs substantial amounts of information that had not previously been required.

Given these facts, AT&T's petition sought (1) clarification regarding its new obligations to track and pay payphone compensation on behalf of SBRs in cases where the SBR either cannot or will not track its own calls; and (2) clarification and/or reconsideration of the new information requirements because of their potential extraordinary breadth. As shown below, both of AT&T's requests are reasonable and indeed are accepted by many commenters. Accordingly, they should be granted.

#### **I. FFB IXC Tracking and Payment Obligations**

The SBRs' comments on AT&T's petition regarding its tracking and payment obligations show that many commenters misunderstand AT&T's request.<sup>4</sup> In an effort to resolve such misunderstandings, AT&T first clarifies below that its Petition does *not* propose that it be permitted to bar its SBRs from tracking payphone calls that are routed

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<sup>3</sup> AT&T Petition at 3; WCOM at i, 3-4. Claims by certain commenters that this information is readily available to FFB IXCs are mistaken (*e.g.*, CommuniGroup at 7-12). Indeed, there is no reason to believe that an SBR even uses the same carrier to transmit all of the segments of a single call.

<sup>4</sup> *E.g.*, Ad Hoc Resellers at 2; Intellicall at 6-8. In contrast APCC (at 2) supports AT&T's Petition in this regard; *see also* RBOC Coalition at 2.

to their networks. Rather, as explained in detail below, AT&T is affirmatively willing to enter into agreements that will allow SBRs to track their own calls, provided that they agree to comply with all of the obligations established in the *Order*.

Second, because AT&T will agree to enter such contracts with SBRs, it is evident that its petition does *not* seek to change the basic definition of a “completed call” as established by the Commission. Rather, AT&T seeks only a narrow clarification that *if* an SBR elects not to enter into an agreement as described above, AT&T may use its answer supervision data regarding payphone-originated calls that reach the SBR’s switch to calculate obligations to PSPs under the Commission’s new rules.

Third, AT&T flatly opposes some PSPs’ assertion<sup>5</sup> that the Commission’s recent changes in its *administrative* rules should make FFB IXCs *guarantors* of the SBRs when the IXCs act in good faith and provide PSPs with information they can use to follow up on any SBR deficiencies.

**A. AT&T is Willing to Enter into Reasonable Agreements with SBRs that Implement All of the Commission’s New Rules**

Despite some commenters’ mistaken assumption, AT&T is in fact willing to enter into agreements with SBRs that are able to provide AT&T with the call completion information it must have to pass onto PSPs.<sup>6</sup> Such agreements must reflect, however, *all* of the new rules the Commission has imposed, including the SBRs’ duty to make IXCs

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<sup>5</sup> RBOC Coalition at 13 (if the IXC allows the SBR to track calls “the first switch IXC – not the switch-based reseller – that remains liable to the PSP if those systems prove inadequate or inaccurate”).

<sup>6</sup> This is exactly what IDT (at 35) requests.

whole for assuming these new administrative obligations. This requires agreements in four areas.

First, AT&T will require SBRs to provide reasonable assurances that they have the technical capability to track payphone calls completed over their networks.<sup>7</sup> Thus, they must represent to AT&T (through an appropriate company official) that: (1) they have systems in place to track completed calls from payphones; (2) such systems rely on the industry technical standard, *i.e.*, answer supervision, to determine whether calls are completed on their networks; (3) they will track and retain certain information on calls completed over their networks and will produce such information to PSPs upon reasonable request in the event of a dispute<sup>8</sup>; and (4) they will arrange (and pay) for an annual third party audit of their call tracking systems and submit reports of such audits to AT&T, and that AT&T may provide such reports to PSPs.

Second, in order to enable AT&T to meet its requirements to provide information to PSPs regarding completed payphone calls, SBRs must provide AT&T with the data that it must pass to the PSPs relating to such calls. Assuming that the Commission adopts the consensus modifications referenced in Part II below, SBRs must provide AT&T with the following information about payphone calls completed on their networks<sup>9</sup>:

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<sup>7</sup> See Intellicall at 4 (IXCs may require SBRs “to provide accurate data in a specific format”).

<sup>8</sup> The information that AT&T requires is comparable to the information AT&T retains for itself and is set forth in Attachment 1.

<sup>9</sup> In this regard, AT&T is confused by One Call’s reference (at 4) to its call completion rate for 0+ calls. Such calls are generally exempt from payphone compensation, and when they are subject to such compensation the carrier is obligated to track such calls directly.

<u>Field Name</u>	<u>Format</u>
MONTH	XX
YEAR	XXXX
STATION #	X(10)
COMPLETED CALLS	9(7)

Third, in order for AT&T to include such data in its quarterly reports to PSPs (which are currently prepared for AT&T by the National Payphone Clearinghouse), AT&T must receive the above information in electronic format on a diskette, CD, or email attachment, or through Connect:Direct mainframes. Information on Excel spreadsheets is not acceptable. Moreover, in order to assure that the data are received in time to be processed as part of AT&T's quarterly reports, SBRs must agree to provide such data to AT&T or its designee on a monthly basis no later than the 25<sup>th</sup> day of the following month (*e.g.*, data for September must be received by October 25).

Fourth, SBR must provide adequate assurances that AT&T will receive appropriate reimbursement under the Commission's rules.<sup>10</sup> Thus, SBRs must agree: (1) to submit an electronic payment in immediately available funds to the AT&T account at the National Payphone Clearinghouse (or such other account as AT&T may designate) so they may be included in the payments made on behalf of AT&T;<sup>11</sup> (2) to reimburse

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<sup>10</sup> Flying J's request (at 13-14) that the Commission should require FFB IXC's to reimburse the resellers for the costs the IXC's face in performing the new tracking obligation simply ignores the *Order* and stands its requirements on their head. At best, this represents an untimely request for reconsideration that the Commission should reject out of hand.

<sup>11</sup> The SBR must also agree to reimburse AT&T for any interest that may be due to PSPs because of late receipt of data or late funds transfers. Alternatively, the SBR may make alternative payment arrangements with AT&T, subject to mutually agreeable terms.



AT&T for all of the administrative expenses it incurs in accepting and processing the SBR data feeds (either itself or through the clearinghouse), and for any systems modifications necessary in AT&T's systems to accommodate SBR data;<sup>12</sup> and (3) to indemnify AT&T generally against any other cost or expense AT&T incurs in connection with processing the SBR's payphone compensation payments and data for PSPs, including but not limited to interest and attorneys fees.

All of these requirements are tailored to provide reasonable assurances that the SBRs' data are accurate and complete and that AT&T will be reimbursed for the administrative functions it must perform under the Commission's new rules.

It should also be noted that none of the above precludes an SBR from establishing a direct relationship with a PSP, if those parties choose to do so.<sup>13</sup> In such cases, however, it is essential that FFB IXCs receive information regarding such relationships so that they can remove calls from the PSP's payphones to the SBR's telephone numbers from their compensation payment processes.<sup>14</sup> Moreover, when PSPs and SBRs enter

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<sup>12</sup> AT&T has not yet developed such charges, but believes that the systems development costs should not be particularly large if the SBR submits its data in the required formats.

<sup>13</sup> See *Order* ¶ 19. An SBR does not require "consent" from the FFB IXC to enter into a direct compensation agreement with a PSP (see APCC at 10). AT&T is not aware, however, that any such agreements have been reached between SBRs and PSPs subsequent to the *Order*, which provides that pre-existing agreements between SBRs and PSPs are only effective "if all involved parties wish to continue them." (*Order* at ¶ 19) Further, contracts between SBRs and clearinghouses (see IDT at 21-22; IPCA at 1-3; Telstar at 19-20) are not contracts with PSPs. AT&T further notes that, given the fact that SBRs would, pursuant to AT&T's Petition, have the ability to track their own completed calls, granting AT&T's Petition would not discourage PSPs from entering into direct contractual relationships with SBRs (see Ad Hoc Resellers at 6).

<sup>14</sup> RBOC Coalition at 9; WCOM at 8-9; see also One Call Petition for Waiver at 2 (implying the need for similar coordination).

private agreements, the RBOC Coalition correctly states (at 9) that the Commission should assure that IXCs are held harmless in the event of a dispute between those parties.<sup>15</sup> The most efficient way to do this is to incorporate a release into the Commission's rules, and to require that any private agreement between an SBR and a PSP contain a specific release of the FFB IXC by both parties for all claims relating to the calls covered by the agreement.<sup>16</sup> In addition, the Commission should make clear that if an FFB IXC inadvertently submits compensation on behalf of an SBR that has contracted directly with a PSP, the PSP has an immediate obligation to remit such erroneous payments to the IXC.<sup>17</sup>

**B. AT&T is Not Asking the Commission to Modify the Basic Definition of a "Completed Call"**

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It is obvious from the above that, contrary to several commenters' claims,<sup>18</sup> AT&T's petition does *not* seek a wholesale redefinition of the term "completed calls." Rather, it seeks only a clarification that is directly required as a result of the Commission's recent changes to its rules. Critically, several commenters expressly agree with such a clarification.

As shown above, if SBRs have effective systems and processes in place that enable them to track completed calls, *i.e.*, calls answered by the called party, AT&T will

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<sup>15</sup> See also Ad Hoc Resellers at 7; APCC at 10; WCOM at 9-10.

<sup>16</sup> To the extent that a PSP does not have a direct contractual arrangement with the FFB IXC relating to such calls, the contract should make the IXC an express third party beneficiary of the release (*see* APCC proposed Rule 64.1310(a)(4)(A)).

<sup>17</sup> AT&T Comments at 4-5.

<sup>18</sup> *E.g.*, ASCENT at 2; Flying J at 2; Telstar at 3.

permit them to use such systems.<sup>19</sup> It is only in cases where an SBR does *not* have such systems in place (or where the SBR is unwilling to comply with the Commission's other directives as reflected in AT&T's contractual requirements) that AT&T seeks clarification that it may fall back on the only data source left to it – its record of calls completed to the SBR's switch. In such cases, it is completely reasonable for AT&T to pay PSPs based on such information and to require full reimbursement from the SBRs.

In fact, a number of commenters, including SBRs, concur with AT&T's position. As CommuniGroup (at 13) states, “[u]nless the switch-based reseller cooperates in providing call completion reports, it will be in no position to criticize the facilities-based IXC for paying the PSP for both completed and uncompleted calls and passing on that charge.” Similarly, Flying J (at 11-12) states, “[i]f the SBRs fail or refuse to provide complete [call completion] information to their IXCs, then the SBRs should be responsible to reimburse the IXCs for payment to PSPs for calls connected to the SBR switch that are not answered by the called party.”<sup>20</sup> Thus, when clearly understood, AT&T's request for clarification is in fact uncontroversial and should be granted.

**C. AT&T is *Not* the Guarantor of the SBRs' Systems or Solvency**

The *Order* (¶ 15) expressly states that the Commission's new rules are adopted “in the interest of administrative efficiency and lower costs.” AT&T supports those

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<sup>19</sup> See AT&T Comments at 2-3 (SBRs “always . . . [have] the opportunity to choose the lower-cost alternative”).

<sup>20</sup> With respect to claims of alleged excessive charges relating to payphone compensation, the RBOC Coalition (at 3, 6) correctly points out IXCs' decisions on how to collect their payphone-related costs are a matter of private agreement. See *Report and Order*, CC Docket No. 96-128, released September 20, 1996, ¶ 86 (“facilities-based carriers may recover the expense of payphone per-call compensation from their reseller customers as they deem appropriate”).

changes insofar as they make the payphone compensation process more reliable on the one hand and easier to administer on the other. However, the cornerstone of these new rules is that FFB IXCs are to be made financially whole for the new *administrative* tasks they must perform. Thus, there is no basis to transform FFB IXCs that act in good faith to implement the new rules into the PSPs' *guarantors* of the SBRs' systems or solvency.

But that is exactly what the RBOC Coalition (at 13) proposes. Even if the FFB IXC has acted reasonably and in good faith in obtaining and forwarding to the PSPs *all* of the call tracking data and *all* of the compensation payments it receives from an SBR, the RBOC Coalition claims that the IXCs "remain liable to the PSPs if those [SBR] systems prove inadequate or inaccurate." This is simply beyond the realm of the rational or reasonable, especially since FFB IXCs would also be providing PSPs with data on the number of calls completed to the SBRs' switches.<sup>21</sup>

Under the contract terms described by AT&T, SBRs would not only be required to represent that their systems can track completed calls using the industry standard answer supervision process, they would be required to track and retain reasonable data on such calls and to arrange for (and provide) annual third party audits that validate the accuracy of their systems, which will be available to the PSPs. Moreover, the APCC's proposed rule modifications, with which AT&T generally agrees, also require IXCs to provide PSPs with information regarding the number of calls for which they received answer supervision from the SBR's switch.<sup>22</sup> That should provide the PSPs with all the information they need to check on the performance of the SBRs and their systems.

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<sup>21</sup> See APCC at 9 and proposed Rule 64.1310(a)(3)(B); AT&T at 3.

<sup>22</sup> APCC proposed Rule 64.1310(a)(3)(B).

APCC at 9. To require IXC's also to *guarantee* the accuracy of the SBR's systems is highly excessive, however, because the IXC's do not operate the SBR's systems, they cannot control the operation of the SBR's systems, and they have no direct access to the SBR's call detail records.

It is one thing for the Commission to adjust the administration of the payphone compensation regime so that PSPs can have a reasonable expectation that they will receive compensation for all completed calls, and also have access to facts they need if they suspect undercounting by a reseller. It is quite another, however, to make FFB IXC's ultimately responsible to *guarantee* the "adequate" and "accurate" operation of their reseller competitors' processes,<sup>23</sup> or to make the IXC's responsible for any financial default by the SBR's. Under the circumstances AT&T describes above, that is pure overreaching and should not be permitted.<sup>24</sup>

## **II. IXC Data Requirements**

Many commenters agree with AT&T that the potential scope of the Commission's new reporting requirements is excessive and beyond the PSPs' reasonable needs.<sup>25</sup> Thus, AT&T sought clarification and/or reconsideration from the Commission to ensure that such requirements are not as broad, unwieldy and expensive as some parties might have interpreted them to be.

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<sup>23</sup> The resellers themselves argue that their payphone services are offered in competition with those of the FFB IXC's (*see, e.g.*, ASCENT at 12).

<sup>24</sup> IDT n.39.

<sup>25</sup> *E.g.*, ASCENT at 15-16; IDT at 20; Qwest at 7; WCOM at 11.

Fortunately, in recent weeks, AT&T and others in the industry have settled on a revised list of data requirements that meet the PSPs' reasonable needs but do not require excessive additional administrative and other costs for carriers.<sup>26</sup> Accordingly, as noted in AT&T's Comments (at 3), AT&T supports, in general, the reporting principles referenced in APCC's comments. Although these new data requirements would in fact force AT&T to incur considerable additional expense (including the cost of conducting annual third party audits<sup>27</sup>), AT&T would agree to comply with those negotiated requirements, provided that: (i) the Commission makes clear that FFB IXCs do not have to provide PSPs with quarterly reports containing call-specific information on individual completed calls, and (ii) no information on individual incomplete calls needs to be provided.<sup>28</sup> The former would require IXCs to transmit vast amounts of data to PSPs every quarter, data that would likely overwhelm the PSPs and would only be infrequently (if ever) used. The latter would require AT&T to develop new systems and processes for payphone tracking, because AT&T's systems only recognize calls for which answer supervision is received. The minimal benefits of such information<sup>29</sup> are more than outweighed by their costs, especially since IXCs would be providing call completion

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<sup>26</sup> See APCC at 6-7 ("[t]he parties have reached consensus on principles that reasonably balance the concerns of both sides"); RBOC Coalition at 4; WCOM at 12; *see also* Qwest at 8.

<sup>27</sup> See APCC proposed Rule 64.1310(a)(2).

<sup>28</sup> AT&T Comments at 4; Qwest at 8; WCOM at 13. AT&T agrees, however, with APCC's proposal to make quarterly data available regarding the general completion rate of various types of payphone calls (*see* APCC proposed Rule 64.1310(a)(2); WCOM at 12).

<sup>29</sup> See Bulletins at 9-10.

rates on various categories of calls and their processes for calculating such rates would also be subject to audit.<sup>30</sup>

Accordingly, AT&T recommends that the Commission adopt the data requirements proposed by APCC, subject to the limitations and exceptions described in this Reply.

### **III. Other Issues**

The comments also raise a few other issues that AT&T addresses briefly below.

*Timing surrogates* – There is widespread agreement that the Commission should not make a wholesale change in its definition of a completed call by developing timing surrogates. This oft-raised proposal should be rejected again.<sup>31</sup>

*Effective date* – As is obvious from the comments, the Commission's new rules have created considerable confusion.<sup>32</sup> Assuming that AT&T's petition is granted and the data requirements are clarified/modified as described above, AT&T expects to be able to comply with the new rules as of the effective date.<sup>33</sup> Nevertheless, there is no assurance that the Commission will act on these petitions until after the effective date.

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<sup>30</sup> See APCC proposed Rule 64.1310(a)(2). Contrary to the RBOC Coalition's statement (at 11-12), IXCs would not provide "the number of call attempts" but rather their call completion rates for various types of calls. The former would require the type of specific data that AT&T's payphone compensation systems do not track, *i.e.*, specific numbers of calls that do not receive answer supervision. See also CommuniGroup n.16 (SBRs "normally do not keep information on uncompleted (and therefore unbillable) calls").

<sup>31</sup> *E.g.*, AT&T Comments at 1; RBOC Coalition at 2; APCC at 11; Flying J at 7; IDT at 41.

<sup>32</sup> See, *e.g.*, Global Crossing at 5; IPCA at 4.

<sup>33</sup> Moreover, since AT&T has not yet executed any tracking agreements with SBRs, it would therefore expect to continue its current practices unless and until agreements with SBRs are executed over time.

Therefore, AT&T suggests that the effective date of the new rules be postponed until the Commission has ruled on the petitions and the parties have greater certainty regarding their responsibilities. AT&T also believes that it would be most practical to have the new rules take effect at the beginning of a compensation quarter.<sup>34</sup> Finally, there is no basis, as Flying J suggests (at 22), to apply the new rules retroactively, since, whatever the result, the industry participants' administrative obligations can only be modified on a prospective basis.

### CONCLUSION

For the reasons set forth above and in AT&T's Petition and Comments, the Commission should clarify and modify its payphone compensation rules in the manner described by AT&T.

Respectfully submitted,

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<sup>34</sup> Sec WCOM at 13.



# Attachment 1

## EMI 170 BYTE CALL DETAIL FILE

### RECORD LAYOUT

LEVEL	FIELD NAME	FORMAT	START	END	LENGTH
5	CATEGORY	99	1	2	2
5	GROUP-CODE	99	3	4	2
5	REC-TYPE	99	5	6	2
5	REC-DATE	GROUP	7	12	6
10	REC-DATE-YY	99	7	8	2
10	REC-DATE-MM	99	9	10	2
10	REC-DATE-DD	99	11	12	2
5	FROM-NUM	GROUP	13	22	10
10	FROM-NPA	999	13	15	3
10	FROM-NNX	999	16	18	3
10	FROM-LINE	9(4)	19	22	4
5	TO-NUM	GROUP	23	32	10
10	TO-NPA	999	23	25	3
10	TO-NNX	999	26	28	3
10	TO-LINE	9(4)	29	32	4
5	CHG-AMT-COLL	9(4)V99	33	38	6
5	CONNECT-TIME	GROUP	39	44	6
10	CONN-TIME-HH	99	39	40	2
10	CONN-TIME-MM	99	41	42	2
10	CONN-TIME-SS	99	43	44	2
5	BILLABLE-TIME	GROUP	45	50	6
10	BILL-MINS	9(4)	45	48	4
10	BILL-SECS	99	49	50	2
5	RATE-PERIOD	9	51	51	1
5	RATE-CLASS	9	52	52	1
5	MESSAGE-TYPE	9	53	53	1
5	INDICATOR-1	9	54	54	1
5	INDICATOR-9	9	55	55	1
5	INDICATOR-19	9	56	56	1
5	INDICATOR-21	9	57	57	1
5	INDICATOR-23	9	58	58	1
5	SETTLEMENT-CODE	X	59	59	1
5	CREDIT-CARD-NUM	GROUP	60	78	19
10	BILLING-NUM	GROUP	60	69	10
15	BILL-NPA	XXX	60	62	3
15	BILL-NXX	XXX	63	65	3
15	BILL-LINE	X(4)	66	69	4
10	BILLING-FILLER	X(9)	70	78	9
5	METHOD-OF-RECORDING	99	79	80	2
5	FROM-RAO	999	81	83	3
5	BILLING-RAO	999	84	86	3
5	ICO-INDICATOR	X	87	87	1

5	INDICATOR-16	9	88	88	1
5	INDICATOR-24	9	89	89	1
5	INDICATOR-25	9	90	90	1
5	NA-FROM-STATE	XX	91	92	2
5	ROCH-LOCAL-IND	X	93	93	1
5	AATOS-IND	X(5)	94	98	5
5	REC-POINT-ID	9(6)	99	104	6
5	INDICATOR-3	9	105	105	1
5	INDICATOR-10	9	106	106	1
5	INDICATOR-11	9	107	107	1
5	INDICATOR-12	9	108	108	1
5	MSI	9	109	109	1
5	SIC	999	110	112	3
5	SERVICE-FEATURE	999	113	115	3
5	PAYPHONE-COMP	X	116	116	1
5	FILLER	XXX	117	119	3
5	BILL-DESTINATION-NUM	9(10)	120	129	10
5	FULL-REC-DATE	GROUP	130	137	8
5	FULL-REC-DT-YYYY	9(4)	130	133	4
5	FULL-REC-DT-MM	99	134	135	2
5	FULL-REC-DT-DD	99	136	137	2
5	FILLER	X	138	138	1
5	NA-TO-STATE	XX	139	140	2
5	ORIG-CHG-AMT	9(4)V99	141	146	6
5	RE-RATE-STATUS	X	147	147	1
5	COUNTRY-CODE	XX	148	149	2
5	ID-RATES-IND	X	150	150	1
5	INCOLLECT-IND	X	151	151	1
5	INTRA-SUR	999	152	154	3
5	OCN-NO	9(5)	155	159	5
5	BILL-TO-STATE	XX	160	161	2
5	FILLER	X(9)	162	170	9

### **CERTIFICATE OF SERVICE**

I, Theresa Donatiello Neidich, do hereby certify that on this 22nd day of October, 2001, a copy of the foregoing "AT&T Reply on Petitions for Declaratory Ruling, Reconsideration and/or Clarification" was served by US first class mail, postage prepaid, on the parties named on the attached service list.



Theresa Donatiello Neidich

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